

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Chapter 11
WOPIRB, LLC	:	
	:	Bky. No. 23-12722-pmm
Debtor(s).	:	
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	:	<b>MOTION FOR RELIEF FROM STAY</b>
Stormfield Capital Funding I, LLC,	:	1301-03 West Moyamensing Avenue
	:	Philadelphia, PA 19148
Movant	:	
	:	Hearing Date: May 8, 2024
vs.	:	Time: 9:30 am
	:	Courtroom: Courtroom 1
WOPIRB, LLC	:	Robert N. C. Nix, Sr. Federal Courthouse
	:	900 Market Street, Philadelphia, PA 19107
Respondent.	:	
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	:	11 U.S.C. § 362

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

STORMFIELD CAPITAL FUNDING I, LLC, ("Stormfield Capital"), has filed a Motion for Relief from the Automatic Stay with the Court seeking to terminate the automatic stay provisions as to Stormfield Capital, and to allow Stormfield Capital to proceed with state court remedies against your premises, 1301-03 West Moyamensing Avenue, Philadelphia, PA 19148, including a Sheriff's Sale of the Premises.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before April 22, 2024 you or your attorney must do all of the following:

- (a) file an answer explaining your position at:

Bankruptcy Clerk's Office  
900 Market Street, Suite 400  
Philadelphia, PA 19107-4299

If you mail your answer to the Bankruptcy Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Stormfield Capital Funding I, LLC  
ATTN: Vincent M. DiMaiolo, Jr., Esq.  
FEIN, SUCH, KAHN & SHEPARD, P.C.  
7660 Imperial Way, Suite 121  
Allentown, Pennsylvania 18195  
(610) 395-3535  
email: vdimaiolo@fskslaw.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Chief Judge Patricia M. Mayer, on May 8, 2024 at 9:30 am, in Courtroom 1, United States Bankruptcy Court, Robert N. C. Nix, Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in Paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

DATED: April 4, 2024

/s/ Vincent DiMaiolo, Jr.  
Vincent M. DiMaiolo, Jr., Esq.  
FEIN, SUCH, KAHN & SHEPARD, P.C.  
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Allentown, Pennsylvania 18195  
(610) 395-3535  
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Attorneys for Movant